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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JAMARR REED,

Plaintiff,

v.

KENNETH WILLIAMS, *et al.*,

Defendant.

Case No. 2:24-cv-00267-GMN-NJK

**MOTION FOR EXTENSION OF TIME
TO PROVIDE INFORMATION
REGARDING JANE DOE
DEFENDANT
(First Request)**

Defendant Kenneth Williams, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Jeffrey D. Whipple, Deputy Attorney General, hereby move for an extension of time to respond to the Court's Order of December 31, 2024¹ pursuant to LR IA 6-1.

MEMORANDUM OF POINTS AND AUTHORITIES

I. FACTUAL ANALYSIS

This is a *pro se* prisoner 42 U.S.C. § 1983 civil rights claim brought by inmate, Jamarr Reed (Reed). On December 31, 2024, this Court issued an Order granting Reed's Motion seeking information from the Nevada Attorney General's Office as to the identity of Jane Doe Defendant.^{2 3} The Court further ordered Defense counsel to provide the

¹ ECF No. 20.

² *Id.*

³ ECF No. 14.

1 requested information by January 13, 2025.⁴ Despite diligent efforts on counsel's part, the
2 identity of the Jane Doe has not been determined yet. As such, Defendants now file a
3 Motion for Extension of Time to comply with the Court's order.

4 **II. ARGUMENT**

5 Rule 16 of the Federal Rules of Civil Procedure allows a schedule to be modified only
6 for good cause and with the judge's consent.⁵ Good cause exists for this extension as despite
7 reasonable inquiry the identity of the individual who communicated with the Plaintiff
8 regarding their medical condition on September 29, 2023 is still unknown. Multiple
9 individuals were on duty that day, and investigation as to who spoke with Plaintiff
10 regarding Plaintiff's medical condition is ongoing. This investigation has been complicated
11 by the fact that the medical kite attached to Plaintiff's Motion⁶ as an exhibit does not
12 appear in his NDOC medical file. An investigation as to the reason for this absence as well
13 as the identity of the Jane Doe is ongoing, and Defendant requests an additional fourteen
14 (14) days to complete this investigation and comply with the Court's order.

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27 ⁴ ECF No. 20.

28 ⁵ FRCP Rule 16(6)(4).

⁶ Exhibit 1 to ECF No. 14.

1 **III. CONCLUSION**

2 Defendants respectfully request this Court extend the deadline for complying with
3 the Court's order issued on December 31, 2024, to provide Reed with the identity of the
4 Jane Doe. Defendants assert the requisite good cause is present to warrant an extension of
5 time, as counsel for Defendants as been diligent in his attempts to locate this information
6 and additional time is needed for the investigation to identify this individual. Therefore,
7 the Defendants request additional time, up until January 27, 2025, to comply with the
8 Court's order.

9 DATED this 13th day of January 2025.

10 AARON D. FORD
11 Attorney General

12 By: /s/ Jeffrey D. Whipple
13 JEFFEREY D. WHIPPLE, Bar No. 16346
14 Deputy Attorney General

15 *Attorneys for Defendant*

16 IT IS SO ORDERED.

17 Dated: January 14, 2025

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Nancy J. Koppe
United States Magistrate Judge